

1. Plaintiff Haiyan Chen is a resident of Illinois.
2. Defendant Southwest Airlines Co. ("Southwest") is a corporation which, upon information and belief, has its principal place of business in Texas. Defendant Southwest is an air carrier engaged in the commercial transport of passengers by air.
3. Defendant Southwest does sufficient business in Illinois to subject it to the jurisdiction of Illinois courts. This action also arises from defendant Southwest's tortious acts in Illinois and defendant Southwest therefore is subject to the specific jurisdiction of Illinois under the Illinois Long Arm statute. Defendant Southwest does business in Cook County, Illinois and this cause of action arises from an occurrence in Cook County, Illinois and venue therefore is proper in this Court.
4. On October 27, 2015, plaintiff Haiyan Chen was a passenger on defendant Southwest's Flight 548 from Chicago's Midway airport to New York's La Guardia airport.

5. On said date and at all times relevant hereto, defendant Southwest, a common carrier, owed plaintiff Haiyan Chen the duty to exercise the highest degree of care so as not to cause injury to plaintiff.

6. On said date, defendant Southwest negligently breached its duty of care owed to plaintiff through one or more of the following negligent acts and omissions:

- (a) negligently assisted passengers in stowing bags in the overhead compartments above plaintiff's seat,
- (b) negligently supervised passengers in the stowing of bags in the overhead compartments above plaintiff's seat,
- (c) negligently allowed passengers to stow oversize bags in the compartments above plaintiff's seat,
- (d) negligently failed to secure the compartments above plaintiff's seat, and
- (e) negligently failed to supervise the securing of the compartments above plaintiff's seat.

7. On said date, as the proximate result of one or more of the above-described negligent acts or omissions of defendant Southwest, a compartment above plaintiff's seat came open and a heavy bag fell onto plaintiff's head and body, causing her to become unconscious and to sustain a concussion and other serious physical injuries, including injuries to her right shoulder, right wrist and lower back, and serious psychological injuries.

8. As the proximate result of one or more of the above-described negligent acts or omissions of defendant Southwest and the above-described injuries plaintiff suffered, plaintiff has sustained pecuniary and non-pecuniary damages, including past and future medical bills, past and future lost wages, permanent disability, disfigurement, pain and suffering, and mental anguish.

WHEREFORE, plaintiff Haiyan Chen, through her undersigned attorneys, prays for the entry of a judgment against defendant Southwest Airlines Co. for an amount in excess of the minimum jurisdiction limits of this Court, together with costs and such other damages as may be allowed by law.

Dated: October 26, 2017

WISNER LAW FIRM, P.C.

By: /s/Floyd A. Wisner
One of the Attorneys For Plaintiff

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